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March 31, 2011

State of Delaware
 Division of Professional Regulation
 Attn: Jean Betley, Supervisor
 Cannon Building
 861 Silver Lake Boulevard
 Dover, Delaware 19904-2467

Received

APR 1 2011

Investigative Unit DPR

Re: Compaint Numbers: 28-05-11 and 28-06-11
 My clients: Lisa Ranger and Seth Fishman, DVM

Dear Ms. Betley:

Please accept this letter as Dr. Seth Fishman's and Ms. Lisa Ranger's response to the Board Complaints filed under the Complaint Numbers listed above. I apologize if this response seems to jump from issue to issue. The Complaint consists solely of a medical record, and it is not clear precisely what allegations require a response.

What is clear is that the Complaint against Lisa Ranger alleges she practiced unlicensed veterinary medicine. This is categorically false. Lisa has not practiced and is not practicing veterinary medicine, and she has not acted and is not currently acting as an unlicensed Veterinary Technician. Ms. Ranger is employed by Dr. Seth Fishman in his business, Equestology. Ms. Ranger's duties include but are not limited to collecting payments from clients, coordinating Dr. Fishman's visits and teleconferences with clients, delivering products and medications prescribed by Dr. Fishman and acting as receptionist and secretary to Dr. Fishman. Ms. Ranger does not give veterinary medical advice. When clients ask her questions that require veterinary medical advice, she refuses to answer (often to the consternation of the client) and arranges for the client to speak directly to Dr. Fishman.

The Complaint references a written medical record of Coastal Veterinary Services, LLC. The medical record indicates that the Complainant, Dr. Brittany Faison, was called to examine "Louisville", a standardbred gelding at Nanticoke Racing. [REDACTED]

[REDACTED] She claims to have spoken to some grooms in the barn, who she chose not to identify by name, who

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EXHIBIT

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reported to her that they injected the horse with Pentosan Gold 12 ml [REDACTED] ^{In} [REDACTED] ^{unit} ^{DPR}
[REDACTED] The complaint/medical record does not clearly indicate it, but it bears pointing out
that neither Dr. Fishman nor Lisa Ranger injected the animal, and neither were present at
Nanticoke Stables at the time of this incident. [REDACTED]

[REDACTED] The complaint alleges that the unidentified grooms in the
barn allegedly told the complainant the following:

Asked about where the medication came from because I did not dispense it. They bought it from Lisa M. Ranger who sells drugs for Seth I. Fishman (Florida license # N1-0002244). I am suspicious this veterinarian does not have a client patient relationship and I am positive the individual driving around the farms selling drugs behind/under Dr. Fishmans [sic] name is NOT a licensed veterinarian. Dr. Fishman is not licensed in Delaware from what I can research online.

Lisa Ranger does not sell drugs for Dr. Fishman. Ms. Ranger delivers supplies for Dr. Fishman. She collects and posts payments made to Dr. Fishman by Dr. Fishman's clientele. It is incorrect and professionally irresponsible to claim that she "sells drugs for Seth I. Fishman".

Dr. Fishman has a very well developed relationship with Les Givens, his family, his stable, and Nanticoke Racing. He has known Mr. Givens for about eight years and is familiar with all the horses in Mr. Givens' stable.

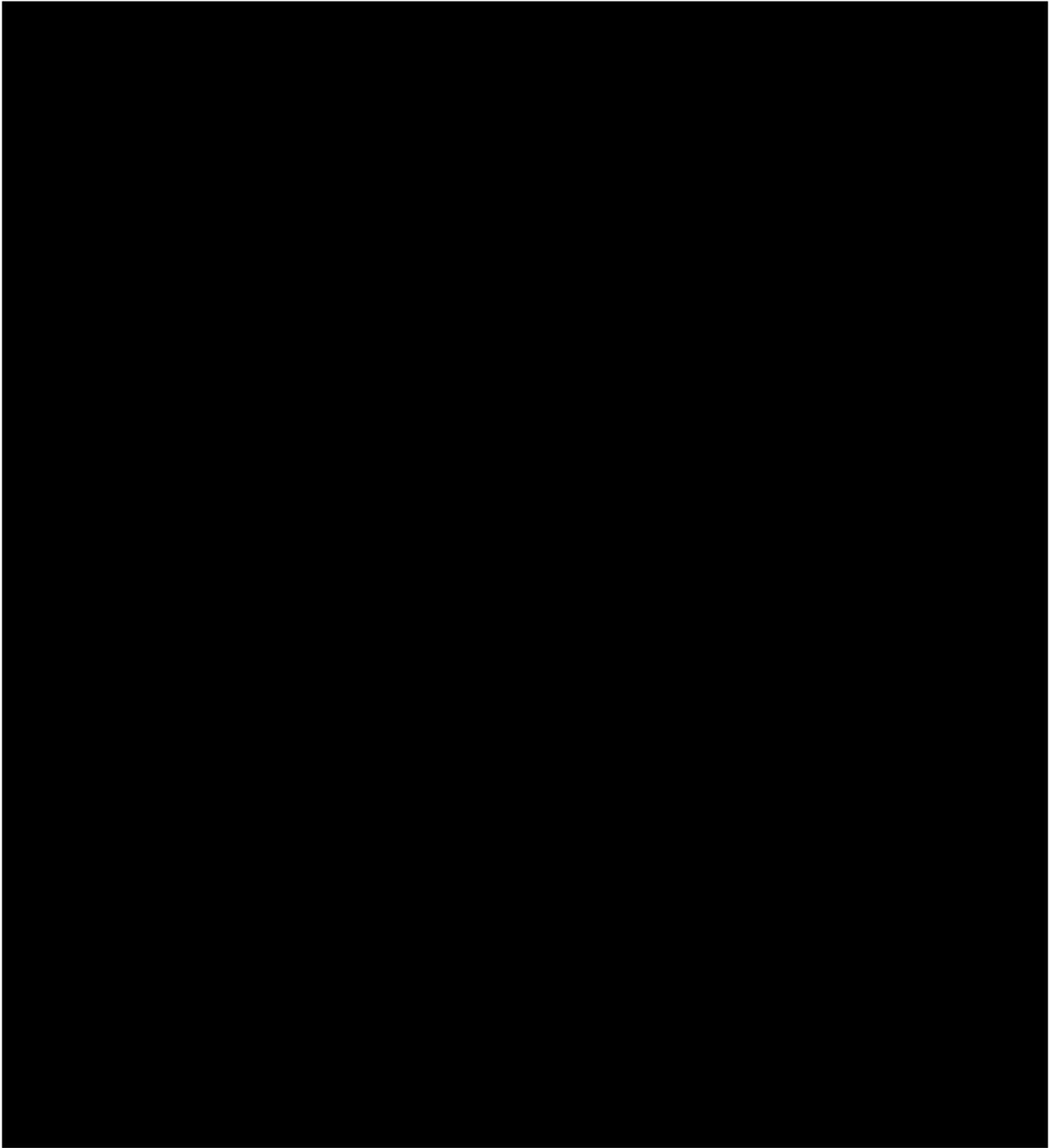
[REDACTED]

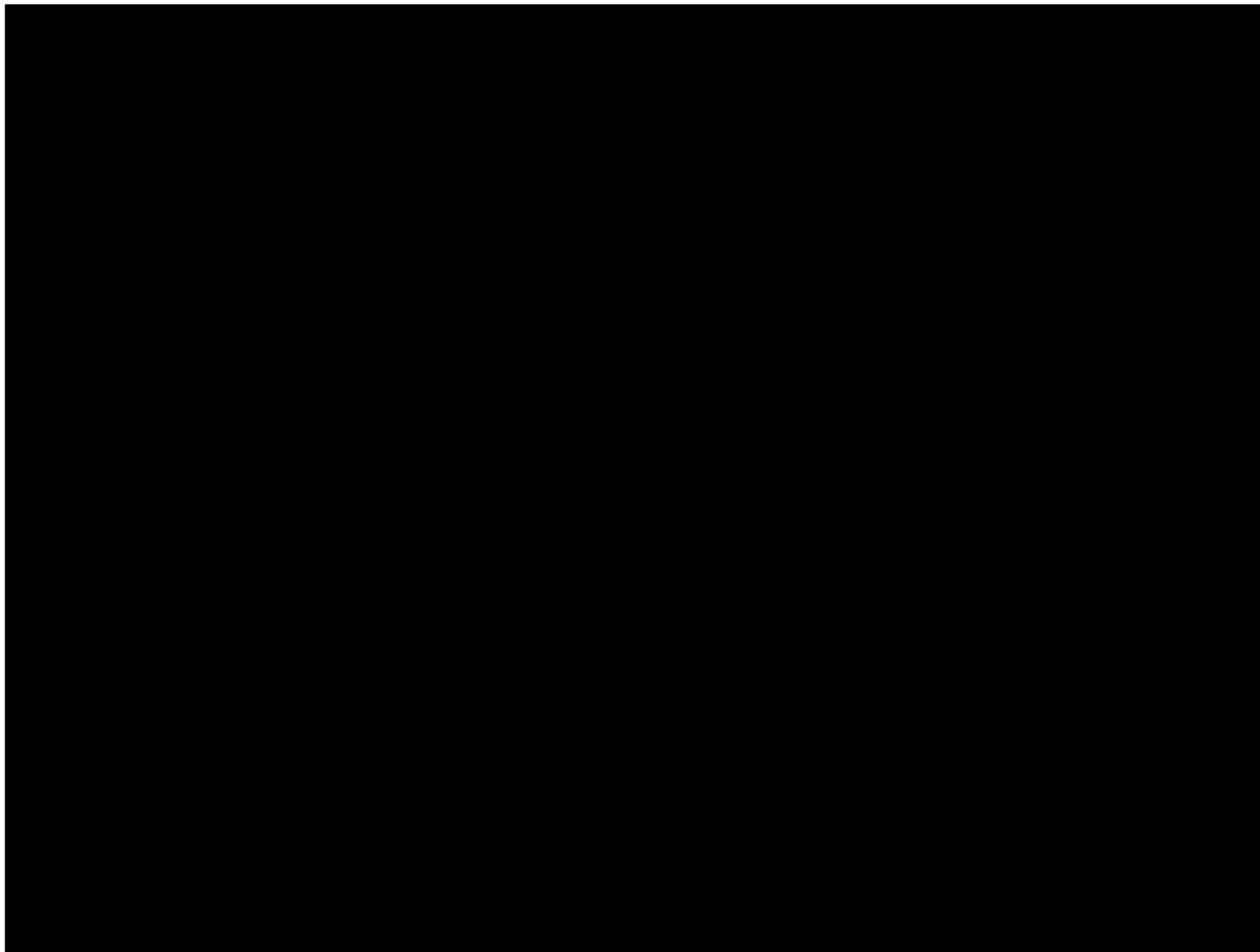
The Complaint also alleges in paragraph number six of the medical record that, "I am concerned this veterinarian is not physically examining these animals and is in the medications sales situation strictly for profit". Dr. Fishman physically examines all animals he treats. And it should be noted that there exist a number of reasons why he provides products: Dr. Fishman strives to provide client convenience, client service and increased client satisfaction. He practices twenty four hours a day / seven days a week, as his clients are global. Based on his commitment to serving them and utilizing an efficient and well managed Delaware-based operation, his clients are more confident using him in many cases rather some local permanent vets with less commitment or dedication to their needs. Ms. Ranger travels to Dr. Fishman's clients, rather than remaining in one location and requiring clients to travel to her. This may explain why Dr. Faison reports she has

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seen Ms. Ranger traveling to meet with Dr. Fishman's clients. Ms. Ranger is willing to personally deliver as a convenience, and she provides extended service that clients prefer. Dr. Fishman can have Lisa Ranger deliver products to local clients during business hours, after-hours and wherever they are needed. Again, in regards to selling products, Lisa Ranger is nothing more than a delivery person for Dr. Fishman's practice.





Because there are no violations of the laws or regulations governing veterinarians, we respectfully request that the Complaint be dismissed.

Sincerely,



BENJAMIN A. SCHWARTZ
Delaware Bar ID No. 4145

STATE OF DELAWARE)
COUNTY OF KENT) SS:

AND NOW, this 30th day of March, 2011, appeared before me, a Notary Public in the State and County aforesaid, Lisa Ranger, known by me personally to be such, and she did depose and say that the facts concerning her as set forth in the foregoing response to Board Complaint are true and correct.



LISA RANGER



NOTARY PUBLIC

**Benjamin A. Schwartz
Delaware Attorney at Law
Notary Public pursuant
to 29 Del.C. § 4328 (a) (3)
Delaware Bar ID No. 4145**

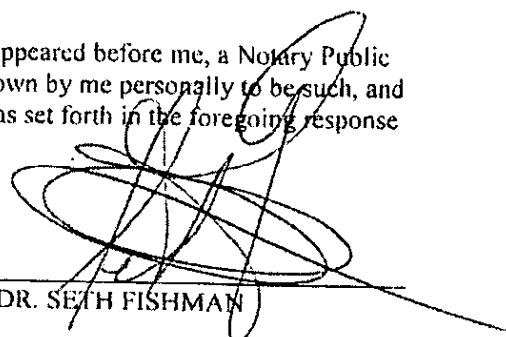
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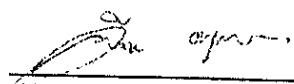
APR 1 2011

Investigative Unit DPR

STATE OF Bangkok)
COUNTY OF Thailand) SS:

AND NOW, this ____ day of March, 2011, appeared before me, a Notary Public in the State and County aforesaid, Seth Fishman, known by me personally to be such, and he did depose and say that the facts concerning him as set forth in the foregoing response to Board Complaint are true and correct.

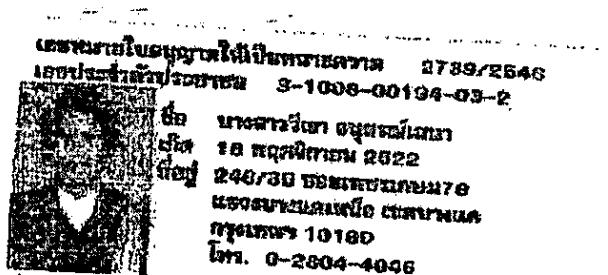

DR. SETH FISHMAN


NOTARY PUBLIC

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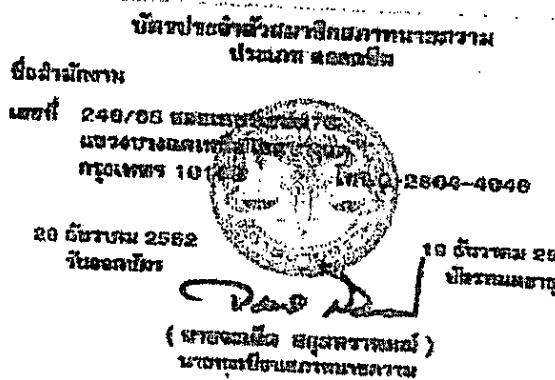
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Investigative Unit DPR



นายมีห์พันธุ์

(พนักงานสอบสวน)
สำนักงาน民检察院อาญา



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